

16 January 2001

Mr. Alan W. Brooks
Engineering Associate
Air Permit Section
KDHE/BAR
Forbes Field, Building 283
Topeka, KS 66620-0001

Dear Mr. Brooks:

The following initial comments/questions are in regard to the proposed Class I Title V air operating permit for UtiliCorp United - Judson Large Station located at 11453 Fort Dodge Road in Dodge City, Kansas (source ID number 0570001). The EPA would like to note that we do not consider the application or the Statement of Basis to be an integral part of the operating permit. If there is something in the application or Statement of Basis that needs to be in the permit, it must be incorporated (or at least referenced) in the permit itself. Also, please send a copy of the final permit and final Statement of Basis to Gary Schlicht of my staff at the regional office (mail code ARTD/APCO).

The comments from EPA-Region 7 on the proposed Title V air operating permit for UtiliCorp United - Judson Large Station are as follows, with potentially significant comments marked with an asterisk. These comments do not constitute an objection under 40 CFR 70.8(c).

- 1) The original application, which was received by BAR in February of 1997, stated in number 14 of form GI-01(source information) that the "fuel for the boiler is primarily natural gas but the boiler has the capability of burning fuel oil." It is referring to EU-BOILER4. An updated application received by BAR in April of 2000, in number 14, refers to the same unit as being a "natural gas fired industrial boiler." There is no mention of fuel oil capability. Which is correct? If there is, in fact, fuel oil capability for this boiler, appropriate opacity requirements while burning fuel oil should be included for this unit in section E1 of the applicable requirements.
- 2) In the Statement of Basis number 22, the old CAM generic language is still used saying that the source is "not" subject to CAM. It was agreed that in the initial permits this statement should read "not currently" subject to CAM as a source may be subject to CAM upon the first renewal of the permit. Please insure that this new language is used in future permits.
- 3) The page numbers are missing. Please add page numbers per your current system (for example, "Page 2 of 20") to insure that all pages are included in the permit.

These are the initial formal EPA comments on the proposed Title V air operating permit for UtiliCorp United - Judson Large Station. These comments are being made during the EPA

45-day comment period. These comments were electronically forwarded to BAR previously with this letter being the official hard copy transmission. The comments should be identical. If there are any questions or if you wish to discuss any of these comments, please contact Gary Schlicht of my staff at (913)551-7097.

Sincerely,

Don Toensing, Chief
Air Permitting & Compliance Branch